



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 12, 2023

BY ECF

Honorable Nina R. Morrison
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States of America v. Rare Breed Triggers, LLC, et al.*,
No. 23-CV-369 (Morrison, J.) (Levy, M.J.)

Dear Judge Morrison:

The parties jointly respectfully request the Court's endorsement of the below proposed schedule in advance of the May 23, 2023 preliminary injunction hearing.

	Deadline
Defendants' Opposition to the United States' Motion for Preliminary Injunction (Dkt. No. 5) shall be filed by:	April 28, 2023
The Parties shall exchange all expert disclosures pursuant to the Federal Rules of Civil Procedure, including any expert reports by:	April 28, 2023
The United States' Reply Brief in Support of its Motion for Preliminary Injunction shall be filed by:	May 8, 2023
The Parties' proposed Witness and Exhibit Lists for the Preliminary Injunction Hearing shall be exchanged by:	May 12, 2023
The Parties' respective Witness and Exhibit Lists for the Preliminary Injunction Hearing shall be filed by:	May 18, 2023
The Parties' respective Motions <i>in Limine</i> in advance of the Preliminary Injunction Hearing shall be filed by:	May 18, 2023
The Parties' respective Oppositions (if any) to Motions <i>In Limine</i> in advance of the Preliminary Injunction hearing shall be filed by:	May 22, 2023 at 12 p.m.

Additionally, following a meet-and-conferral between the parties with respect to the United States' discovery requests, the parties respectfully request the Court's endorsement of the attached confidentiality and protective order.

The United States thanks the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE
United States Attorney

/s/

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Encl.

cc: All Counsel of Record (By ECF)